

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED
SOCIETIES, *et al.*,

Plaintiffs,
v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment for the Humanities, *et al.*,

Defendants.

Case No. 1:25-cv-03657

DECLARATION OF Jason Rhody

I, Jason Rhody declare as follows:


1. I, Jason Rhody, am Senior Director of Engagement Strategy at the Modern Language Association (MLA).
1. I am both a member and an employee of the Modern Language Association.
2. I was in the process of applying for a grant from the State and Impact of the Humanities program offered by the Office of Data and Evaluation on the topic of “The State of the Academic Workforce and Working Conditions in Languages and Literatures.” We were seeking a Level 2 grant award for \$150,000.
3. Following NEH procedure for this grant program, we submitted a pre-proposal for review in advance of the deadline. The pre-proposal was submitted to NEH staff on 14 February 2025 and we received feedback from NEH Senior Program Officer Hannah Alpert-Abrams on 14 March 2025.
4. The proposal sought to fund a study that would contribute to the understanding of labor and careers in the humanities and to strengthen models for improved working conditions

in higher education. The MLA, in collaboration with the Association of Departments of English and the Association of Language Departments, has convened an Ad Hoc Committee on the Academic Workforce in Languages and Literatures. This project team is studying workforce, workload, and working conditions issues in languages and literatures, seeking to identify good practices and model programs and to make recommendations to the broader humanities higher education community. Funding was sought to support an expansive study of the academic workforce in languages and literatures, including the analysis of quantitative (surveys and censuses) and qualitative data (interviews and focus groups). Funding was also requested to communicate and disseminate project findings.

5. We received feedback from NEH staff, who noted that this proposal was a “good fit” for the grant program, and that the requested “[funding] level and team are appropriate.” Guidance and appropriate cautions were offered, which we had already started to implement in the full proposal. However, even after this work, which we estimate to have taken approximately 65 hours to complete, following DOGE actions at the NEH, a notification was posted on the NEH website that “The State and Impact of the Humanities funding opportunity is cancelled for FY2026 and is not accepting applications.”

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2025 in New York City, NY.



Jason Rhody